

Via Electronic Mail and US Mail

December 27, 2017



David Burns,  
Massachusetts Department of Environmental Protection  
20 Riverside Drive  
Lakeville, MA 02347

Re: Hull POTW Compliance for Changes in 314 CMR 12.00 – NPDES Permit No. MA0101231

Dear Mr. Burns:

On behalf of the Town of Hull, enclosed and listed below is an update summary on progress made on implementation of regulations for Operation, Maintenance, and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers (314 CMR 12.00). On May 9, 2016, the Town of Hull entered an Administrative Order on Consent with U.S. Environmental Protection Agency (EPA) and MassDEP, (Docket No. CWA-01-AO-16-09) for which several items have been addressed.

- **Hydraulic Interceptor Model:** Attached is the Technical Memo describing the Town's Hydraulic Model of the collection system, the purpose of the model was to focus on the hydraulic capacity of the Town's most critical collection system asset, the Nantasket Avenue Interceptor (The Interceptor). The memo also recommends improvements to the Town's GIS for future modeling, and recommends additional weather and flow data collection in Hull to improve the model outputs. Currently, the hydraulic model uses actual flow data to assess the risk of Sanitary Sewer Overflows (SSOs) from significant storm events over the past three years.
- **Inflow and Infiltration (I/I) Control Plan:** In compliance with Order Item IV.3., a summary of past I/I or sewer system studies/reports, and abatement efforts over the last 5-10 years (funding, work performed) was included in the Control Plan submitted August 31, 2016. Abatement efforts, and improvements made for I/I Control will be included in the CMOM Annual Report, to be submitted by March 31, 2018.
- **Unauthorized Discharge Summary:** In compliance with Order Item IV.1, an "Unauthorized Discharge Summary," was prepared including listing of Hull POTW's SSO events (for at least the past 10 years). The SSO summary is updated annually and the 2017 listing will be included in the CMOM Annual Report, to be submitted by March 31, 2018.
- **Future Work Plan and Schedule:** In August 2017, the Town of Hull submitted the following Project Evaluation Forms for long-term planning and immediate Interceptor construction improvements:
  - Year 1 CMOM and FSP Upgrades (Construction)
  - SSES, Piping and Outfall Hydraulic and Conditional Assessment (Planning)
  - Facility and Resiliency Planning Update (Planning)
  - Reliability Centered Maintenance Assessment (Planning)

All four scopes were included on the Intended Use Plan (IUP) and are in development for the Town of Hull Spring 2018 Town Meeting for approval. When debt authorization is secured, then a more detailed schedule of implementation will be provided.



In addition, the Fiscal Sustainability and Asset Management Plan has been completed and will form the basis of prioritizing and funding recommended improvements (enclosed on CD).

Thank you in advance for your timely review. Please do not hesitate to contact us directly with any questions or concerns.

Sincerely,

WOODARD & CURRAN

Frank Cavaleri  
Senior Principal

Enclosures: Interceptor Hydraulic Model Technical Memorandum  
Administrative Order on Consent No. CWA-01-AO-16-09 Deliverables (on CD)  
Fiscal Sustainability and Asset Management Plan (on CD)

cc: David Turin, EPA  
Phil Lemnios, Town Manager, Town of Hull  
John Struzziery, Director of Wastewater Operations, Town of Hull  
Carol O'Connor, Bookkeeper, Town of Hull  
Rosemary Blacquier, Client Manager, W&C

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